March 21, 2000

OBSERVATION REPORT #53

The validity of certain charges could not be substantiated.

Issue 53.1

The validity of labor charges related to a service order could not be substantiated.

KPMG was charged \$15.47 in labor charges for service order #N5UX9770 on its 1/31/00 resale bill. KPMG has executed similar orders previously and no labor charges were required in these cases. Consequently, KPMG was not expecting that any special work was needed for this order, nor did Bell Atlantic make KPMG aware that special work was required in this case.

KPMG discussed this issue with BA's Resale Billing Help Desk. Though the Help Desk could not provide specific information about why the work was done or what was done, it was able to determine that the BA technician spent an hour working on this order. KPMG asked where in BA-provided documentation it could confirm that an hour was charged for this order, and the Help Desk indicated that it should be on the order. KPMG did not find this on the order. In addition, the Help Desk indicated that, although it could not speak to this particular order for an ISDN line, resellers are not typically charged labor charges for installing POTS lines. The Help Desk indicated that it was somewhat surprised this type of charge appeared on the bill, though it could not speak to this particular order.

KPMG cannot substantiate why this work was done, what the labor charge is for, and whether or not the \$15.47 charge is valid based upon data provided by Bell Atlantic.

Issue 53.2

KPMG cannot determine the method used by Bell Atlantic to present other charges and credits for two suspended accounts.²

KPMG contacted the Resale Billing Help Desk regarding this issue. KPMG discussed the order with the Help Desk for 30 minutes, during which time neither the Help Desk nor KPMG could determine what had been done. The Help Desk representative later tried to resolve the charges offline, as well as asked a colleague to assist in the matter. KPMG followed up with the Help Desk a week and a half later to obtain an update, and at

¹ The associated bill number is 508 Q05-0135 135. The account telephone number is 617-357-0572.

² The service order number to suspend account 617-372-8150 is C5UU1290, with a purchase order number of 19812211999002. This order appears on KPMG's resale bill for 12/31/99, bill number 508 Q05-0135 135. Another order was placed to suspend account 617-372-8502. The associated order number is C5WV261 with purchase order number 186106200001. This order appears on KPMG's 1/31/00 resale bill, number 508 Q05-0135 135.

that point, neither representative of the Help Desk had been able to determine how the OC&Cs were presented on the bill. The documentation KPMG has from BA is not sufficient to allow KPMG to validate the charges for this order.

Assessment

If Bell Atlantic does not provide sufficient documentation to CLECs to enable them to understand its charges, CLECs cannot validate that other charges and credits are applied correctly on the bill.